

KML Law Group, P.C.

A Professional Corporation incorporated in Pennsylvania

216 Haddon Avenue, Suite 406

Westmont, NJ 08108

(215) 627-1322

Attorneys for Specialized Loan Servicing LLC as servicer for Deutsche Bank National Trust Company, as Indenture Trustee, on behalf of the holders of the Terwin Mortgage Trust 2007-4HE Asset-Backed Securities, Series 2007-4HE

IN THE MATTER OF:

Jeannette Vega

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 7
CASE NO. 19-15428 CMG

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

TO:

Jeannette Vega
119 Dittmar Drive
Toms River, NJ 08757

Yakov Rudikh
Rudikh and Associates
223 Route 18 South, Suite 204
East Brunswick, NJ 08816

FROST, BARRY
3131 Princeton Pike
Suite 110, Building 5
Lawrenceville, NJ 08648

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Specialized Loan Servicing LLC** as servicer for **Deutsche Bank National Trust Company**, as Indenture Trustee, on behalf of the **holders of the Terwin Mortgage Trust 2007-4HE Asset-Backed Securities, Series 2007-4HE**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **U. S. Courthouse, 402 East State**

Street; Trenton, NJ, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **119 Dittmar Drive, South Toms River NJ 08757**. The hearing on this matter is scheduled for **June 4, 2019 at 10:00 A.M.**

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/s/ Denise Carlon, Esq.

Denise Carlon, Esquire

Brian C. Nicholas, Esquire

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dcarlon@kmlawgroup.com

Attorney for Specialized Loan Servicing LLC as servicer
for Deutsche Bank National Trust Company, as Indenture
Trustee, on behalf of the holders of the Terwin Mortgage
Trust 2007-4HE Asset-Backed Securities, Series 2007-
4HE

Dated: April 25, 2019